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## UNITED STATES DISTRICT COURT

### NORTHERN DISTRICT OF CALIFORNIA

#### SAN FRANCISCO DIVISION

#### IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

*Epic Games Inc. v. Google LLC et al.*,  
 Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust Litig.*,  
 Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
 Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.*,  
 Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

#### DECLARATION OF CHRISTIAN CRAMER IN SUPPORT OF ADMINISTRATIVE MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH OMNIBUS MOTIONS IN LIMINE

Judge: Hon. James Donato

1 I, Christian Cramer, declare as follows:

2 1. I am currently a Finance Director for Defendant Google LLC (along with Google-  
3 affiliated entities, “Google”). I have been employed by Google since September 2007 and have  
4 held my current position since March 2017. Over the course of my employment at Google, I  
5 have acquired personal knowledge of Google’s practices and procedures concerning the  
6 maintenance of the confidentiality of its strategic, business, and marketing information.

7 2. I submit this declaration in support of the Administrative Motion to Seal Materials  
8 Submitted in Connection With Parties’ Omnibus Motions in Limine (“Motion”), filed on  
9 October 5, 2023 in *In re Google Play Store Antitrust Litigation* (No. 21-md-02981-JD) (N.D. Cal)  
10 (“MDL”); *see also In re Google Play Consumer Antitrust Litigation* (No. 3:20-cv-05761-JD) (N.D. Cal);  
11 *State of Utah, et al. v. Google LLC et al.*, No. 3:21-cv-05227-JD (N.D. Cal.); *Match Group, LLC et al. v.*  
12 *Google LLC et al.*, No. 3:22-cv-02746-JD (N.D. Cal.); *Epic Games, Inc. v. Google LLC et al.*, No. 3:20-  
13 cv-05671-JD (N.D. Cal.).

14 3. The facts set forth in this declaration are true and correct to the best of my  
15 knowledge, information, and belief, and are based on my personal knowledge of Google’s  
16 policies and practices as they relate to the treatment of confidential information, the materials  
17 that were provided to me and reviewed by me, and/or conversations with other knowledgeable  
18 employees of Google. If called upon as a witness in this action, I could and would testify from  
19 my personal knowledge and knowledge acquired from sources with factual foundation.

20 **The Material to Be Sealed Is Highly Confidential Because It Reflects Non-Public**  
21 **Commercial Agreements and Contract Proposals, and Because It Reveals Google’s**  
22 **Competitive Decision-Making and Business Strategy**

23 4. As demonstrated with factual particularity below, all the material for which  
24 Google requests sealing is maintained as highly confidential. To the best of my knowledge, none  
25 of this material has been publicly disclosed.

26 5. As a matter of routine practice and internal policy, Google and its employees  
27 strictly treat as confidential, inter alia, (i) internal, non-public financial information; (ii) non-  
28 public commercial proposals to third parties; (iii) non-public agreements with third parties; (iv)

1 internal surveys and analyses of customer preferences, spending, revenue, market conditions,  
2 business strategy, competitive dynamics, and commercial opportunities; (v) non-public financial  
3 forecasts and business plans; (vi) trade secrets; and (vii) other sensitive material that, if publicly  
4 disclosed, could potentially enable Google's competitors to undermine Google's competitive  
5 position in the marketplace, allow current or prospective business partners or counterparties to  
6 take unfair advantage of Google in negotiations or other business affairs, violate Google's  
7 confidentiality obligations to third parties, or otherwise prejudice Google's business interests. In  
8 my experience and to the best of my knowledge, Google does not disclose internal documents,  
9 data, or information of this nature outside of the company, except to authorized third parties  
10 when so required or permitted by law or contract. To that end and in order to prevent inadvertent  
11 revelation of this information to the public, Google has several policies in place like prohibiting  
12 employees from accessing information beyond what is reasonably necessary to perform their  
13 duties, limiting access to certain internal systems, permitting access to document databases on a  
14 need-to-know basis, and requiring the use of an encrypted email system. I am also aware that,  
15 generally, Google employees are required to sign a confidentiality agreement requiring each  
16 employee to keep information confidential and shared only within the company.

17         6. Third parties—including Google's customers, suppliers, business partners, and  
18 others who interact or transact with Google in an array of contexts—entrust highly sensitive,  
19 non-public, and confidential information to Google every day. These third parties have an  
20 expectation that Google can and will protect the confidentiality of that information. In many  
21 cases, Google is contractually bound to keep that information confidential. In my experience and  
22 to the best of my knowledge, Google does not disclose internal documents, data, or information  
23 reflecting third parties' confidential information outside of the company, unless and only to the  
24 extent it has been authorized (or is lawfully permitted or required) to do so. Rather, as noted  
25 above, Google policies and protocols are designed to ensure the confidentiality of third-party  
26 material is strictly maintained.

27         **There is Good Cause and Compelling Reasons to Seal Google's Highly Confidential**  
28                 **Material**

7. As demonstrated with factual particularity below, there is “good cause” to seal Google’s confidential materials. But even if Google were required to demonstrate “compelling reasons” for sealing, the materials for which Google requests sealing would still satisfy that standard. The public disclosure of Google’s internal, confidential material (including material that reflects third parties’ confidential information) could, among other things, harm Google’s business and customer relationships, undermine Google’s ability to retain and attract customers and business partners who entrust Google with their confidential information, jeopardize Google’s ability to conduct business with current and prospective business partners, enable Google’s competitors to undermine Google’s competitive position in the marketplace, allow current or prospective business partners or counterparties to take unfair advantage of Google in negotiations or other business affairs, or otherwise prejudice Google’s and/or third parties’ business interests. These materials therefore derive economic value from not being generally known to Google’s competitors, counterparties, or the public. The release of this information to the public will cause tangible commercial injury to Google and to those who provided their confidential information to Google with the expectation that confidences would be maintained.

8. I understand that this Motion requests that the Court maintain the specific information identified below under seal. For the reasons stated below, this information is confidential and highly sensitive, and if publicly disclosed, could significantly prejudice Google's competitive position by harming Google's relationship with business partners, putting Google at unfair disadvantage in future business negotiations, and permitting Google's competitors to gain unfair advantage in competition with Google.

**Specific Information to Be Sealed**

**Plaintiffs’ Omnibus Opposition to Defendants’ Omnibus Motions in Limine No. 5**

9. **Plaintiffs’ Opposition to Google’s Motion in *Limine* No. 5, Page 15, line 4-5 (between “noting that the Google Play Store contributed” and “Alphabet H1’2020 operating profit”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data,

1 which is non-public, and if revealed to competitors and potential business counterparties, could  
2 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
3 confidential Google financial information.

4       **10. Plaintiffs' Opposition to Google's Motion in Limine No. 5, Page 15, line 6-9**  
5 **(between "stating that he holds" and "unvested Google shares").** This text contains the  
6 specific dollar-value of Google shares that an individual Google employee owns. Disclosure of  
7 this personally identifying and highly sensitive personal financial information would violate that  
8 individual's reasonable expectation of privacy in their personal information shared privately with  
9 Google. Google does not seek to redact the *fact* that the employee holds Google stock, which is  
10 relevant to the Motion. But Google does seek to redact exact stock amount: No public interest is  
11 served by the public disclosure of the sensitive, personal information that that specific amount  
12 represents.

13       **Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 2**  
14 **(GOOG-PLAY5-000500320)**

15       **11. Exhibit 2 (Names of chat participants, except for first initials).** This text  
16 contains the identities of current Google employees. Disclosure of these names and email  
17 addresses is of limited value to the public—as their identities are not relevant to the disposition  
18 of this case. The public is still able to view the substantive portions of the document, while  
19 individuals' reputations and identities are protected. Thus, even with narrow redactions of non-  
20 party individuals' names, the public can readily understand the import of Ex. 14 and its interest  
21 in disclosure of Ex. 14 in its entirety is limited and outweighed by the compelling reasons for  
22 sealing.

23       **12. Exhibit 2, Bates -332 (between "Play originally wanted" and "but then**  
24 **settled"; between "the teams agreed on" and end of sentence; between "really burdensome**  
25 **to" and end of sentence; between "mad at" and "and 2) also mad"; between "Google Ads**  
26 **can only" and end of sentence).** This information reveals Google's confidential, non-public  
27 strategic considerations. This information has never been disclosed publicly and the Google Play  
28

product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

**Plaintiffs’ Omnibus Oppositions to Defendants’ Omnibus Motions in Limine – Exhibit 3  
(GOOG-PLAY5-000500584)**

**13. Exhibit 3, Page -631 (Names of chat participants, except for first initials).**

This text contains the identities of current Google employees. Disclosure of these names and email addresses is of limited value to the public—as their identities are not relevant to the disposition of this case. The public is still able to view the substantive portions of the document, while individuals’ reputations and identities are protected. Thus, even with narrow redactions of non-party individuals’ names, the public can readily understand the import of Exhibit 3 and its interest in disclosure of Exhibit 3 in its entirety is limited and outweighed by the compelling reasons for sealing.

**Plaintiffs’ Omnibus Oppositions to Defendants’ Omnibus Motions in Limine – Exhibit 4  
(GOOG-PLAY-001265881)**

**14. Exhibit 4, Page -883 (between “For Samsung:” and “expected new profit/year in 2022”; between “vs. Samsung’s” and “annual profit).”; between “Today: Galaxy store” and “time spent vs. Play store”).** This text includes Google’s estimates for Samsung’s revenue, monthly active users, time spent, and profit for the Samsung Galaxy Store. This text contains confidential, non-public information regarding a non-party OEM, and implicates the non-parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s competitors

1 could use this non-party information to unfairly target Google’s partners. Further, this  
2 information reveals Google's internal non-public profit, revenue, and financial calculations.  
3 These data sets are not otherwise publicly reported by the company and their disclosure is likely  
4 to cause Google competitive harm and give its competitors an unfair advantage. Google's  
5 competitors could improperly utilize this internal, non-public data to modify or augment their  
6 business operations in an effort to compete unfairly against Google. Moreover, visibility into  
7 Google interpretation of the data gives Google's competitors improper insight into the financial  
8 health and future outlook of the Play business, which also arguably gives Google's competitors  
9 an unfair advantage. Further, the disclosure of an OEM’s highly confidential information would  
10 significantly affect the OEM’s business. For example, OEM competitors could leverage this  
11 information to reap an unearned competitive advantage. They could exploit this information—  
12 that they otherwise would not have access to—to inform their own business strategies. To  
13 prevent these competitive harms from coming to fruition, OEMs proactively maintain the  
14 confidentiality of its strategic information, only disclosing it to a select group of individuals on  
15 an as-needed basis.

16       15.     **Exhibit 4, Page -883 (between “For Play:” and “most likely margin at risk**  
17 **for 2022”; between “For developers” and “average net rev uplift”; between “Play: Max**  
18 **revenue risk is” and “; Max margin”; between “Max margin impact” and end of sentence).**

19 This text indicates Google’s estimates for Google Play margins at risk in 2022 related to its non-  
20 public internal assessment of expected performance of the Samsung Galaxy Store, as well as  
21 Google’s estimates of the impact on its developer customers from the Galaxy Store in 2022.  
22 Those estimates include as inputs Google’s estimates for Samsung’s revenue, monthly active  
23 users, time spent, and profit for the Samsung Galaxy Store. This text contains confidential, non-  
24 public information regarding a non-party OEM, and implicates the non-parties’ confidentiality  
25 interests by purporting to reveal the nonparties’ confidential statements made during  
26 negotiations. Further, disclosure of this non-public information is likely to result in competitive  
27 harm to Google, as it reveals strategic decision-making, which, for example, could give a  
28



competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's partners. Further, this information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into Google interpretation of the data gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. Further, the disclosure of an OEM's highly confidential information would significantly affect the OEM's business. For example, OEM competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, OEMs proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Finally, this information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google.

16. **Exhibit 4, Page -885 (text above arrow graphic; between “+ Assumes” and “market share in KR”; between “150 HC,” and “rev share”; between “data,” and “from Ads”).** This text reflects Google's non-public internal estimates and analyses of likely net profits for the Galaxy Store in 2019 and 2022, as well as related risk to Google Play profits in 2022. It also reflects Google's estimates for key inputs into those projections: Samsung's revenue, monthly active users, time spent, and profit for the Samsung Galaxy Store. This text



contains confidential, non-public information regarding a non-party OEM, and implicates the non-parties' confidentiality interests by purporting to reveal the nonparties' confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Google, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Google. Moreover, Google's competitors could use this non-party information to unfairly target Google's partners. Further, this information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, visibility into Google interpretation of the data gives Google's competitors improper insight into the financial health and future outlook of the Play business, which also arguably gives Google's competitors an unfair advantage. Further, the disclosure of an OEM's highly confidential information would significantly affect the OEM's business. For example, OEM competitors could leverage this information to reap an unearned competitive advantage. They could exploit this information—that they otherwise would not have access to—to inform their own business strategies. To prevent these competitive harms from coming to fruition, OEMs proactively maintain the confidentiality of its strategic information, only disclosing it to a select group of individuals on an as-needed basis. Finally, this information reveals Google's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google.

17. **Exhibit 4, Page -897 (between “2-10x” and “/year”); between “estimate roughly” and “potential revenue”; between “Galaxy Store Home screen ads” and end of**

1 **line; between “Game launcher ads” and end of line; between “”N-1 screen” and “potential**  
2 **revenue”; between “CPM” and end of line; between “Monthly impressions” and end of**  
3 **line).** This text includes Google’s non-public analysis and estimations of Samsung’s revenue,  
4 monthly active users, time spent, and profit for the Samsung Galaxy Store. This text contains  
5 confidential, non-public information regarding a non-party OEM, and implicates the non-parties’  
6 confidentiality interests by purporting to reveal the nonparties’ confidential statements made  
7 during negotiations. Further, disclosure of this non-public information is likely to result in  
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19 disclosure of an OEM’s highly confidential information would significantly affect the OEM’s  
20 business. For example, OEM competitors could leverage this information to reap an unearned  
21 competitive advantage. They could exploit this information—that they otherwise would not have  
22 access to—to inform their own business strategies. To prevent these competitive harms from  
23 coming to fruition, OEMs proactively maintain the confidentiality of its strategic information,  
24 only disclosing it to a select group of individuals on an as-needed basis.

25 18. **Exhibit 4, Page -904 (between “Top titles co-list (” and “of Play revenue”;**  
26 **contents of table).** This text projects Samsung’s net profits and related risk to Google Play  
27 profits in 2022 based on internal Google projections for Samsung’s investments into its Galaxy  
28

1 Store. This text includes Google's estimates for Samsung's revenue, monthly active users, time  
2 spent, and profit for the Samsung Galaxy Store. This text contains confidential, non-public  
3 information regarding a non-party OEM, and implicates the non-parties' confidentiality interests  
4 by purporting to reveal the nonparties' confidential statements made during negotiations.  
5 Further, disclosure of this non-public information is likely to result in competitive harm to  
6 Google, as it reveals strategic decision-making, which, for example, could give a competitor or  
7 potential business partner unfair leverage in competing against or negotiating with Google.  
8 Moreover, Google's competitors could use this non-party information to unfairly target Google's  
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21 maintain the confidentiality of its strategic information, only disclosing it to a select group of  
22 individuals on an as-needed basis. Finally, this information reveals Google's internal non-public  
23 profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by  
24 the company and their disclosure is likely to cause Google competitive harm and give its  
25 competitors an unfair advantage. Google's competitors could improperly utilize this internal,  
26 non-public data to modify or augment their business operations in an effort to compete unfairly  
27 against Google.

1           **19. Exhibit 4, Page -915 (between “TAC Payment” and end of sentence; between**  
2 **“Ads Spend:” and “(includes non-mobile division”).)** This text contains confidential, non-  
3 public information regarding non-party business partners, and implicates the non-parties’  
4 confidentiality interests by purporting to reveal the nonparties’ confidential statements made  
5 during negotiations. Further, disclosure of this non-public information is likely to result in  
6 competitive harm to Google, as it reveals strategic decision-making, which, for example, could  
7 give a competitor or potential business partner unfair leverage in competing against or  
8 negotiating with Google. Moreover, Google’s competitors could use this non-party information  
9 to unfairly target Google’s partners. Further, this information reveals Google’s internal non-  
10 public profit, revenue, and financial calculations. These data sets are not otherwise publicly  
11 reported by the company and their disclosure is likely to cause Google competitive harm and  
12 give its competitors an unfair advantage. Google’s competitors could improperly utilize this  
13 internal, non-public data to modify or augment their business operations in an effort to compete  
14 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
15 multiple years) gives Google’s competitors improper insight into the financial health and future  
16 outlook of the Play business, which also arguably gives Google’s competitors an unfair  
17 advantage. Further, the disclosure of mobile carrier and OEM’s highly confidential information  
18 would significantly harm mobile carriers’ and OEMs’ business. For example, mobile carrier and  
19 OEM competitors could leverage this information to reap an unearned competitive advantage.  
20 They could exploit this information—that they otherwise would not have access to—to inform  
21 their own business strategies. To prevent these competitive harms from coming to fruition,  
22 mobile carrier and OEMs proactively maintains the confidentiality of its strategic information,  
23 only disclosing it to a select group of individuals on an as-needed basis.

24           **Plaintiffs’ Omnibus Oppositions to Defendants’ Omnibus Motions in Limine – Exhibit 5**  
25           **(GOOG-PLAY-004488106)**

26           **20. Exhibit 5, page -107.R (between “Ask: Spend” and “in 2023”; between**  
27 **“Offer up to” and “Play rev”; between “to OEMs” and “to smaller OEMs”; between**  
28

1 “spending est” and “in 2020”; between “up to” and “(steady state)”; between “total of” and  
2 “for Xiaomi”; between “Xiaomi and” and “for carriers”). This text contains confidential,  
3 non-public information regarding non-party developers, and implicates the non-parties’  
4 confidentiality interests by purporting to reveal the nonparties’ confidential statements made  
5 during negotiations. Further, disclosure of this non-public information is likely to result in  
6 competitive harm to Google, as it reveals strategic decision-making, which, for example, could  
7 give a competitor or potential business partner unfair leverage in competing against or  
8 negotiating with Google. Moreover, Google’s competitors could use this non-party information  
9 to unfairly target Google’s partners. Further, this information reveals Google’s internal non-  
10 public profit, revenue, and financial calculations. These data sets are not otherwise publicly  
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12 give its competitors an unfair advantage. Google’s competitors could improperly utilize this  
13 internal, non-public data to modify or augment their business operations in an effort to compete  
14 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
15 multiple years) gives Google’s competitors improper insight into the financial health and future  
16 outlook of the Play business, which also arguably gives Google’s competitors an unfair  
17 advantage. Further, the disclosure of mobile carrier and OEM’s highly confidential information  
18 would significantly harm mobile carriers’ and OEMs’ business. For example, mobile carrier and  
19 OEM competitors could leverage this information to reap an unearned competitive advantage.  
20 They could exploit this information—that they otherwise would not have access to—to inform  
21 their own business strategies. To prevent these competitive harms from coming to fruition,  
22 mobile carrier and OEMs proactively maintains the confidentiality of its strategic information,  
23 only disclosing it to a select group of individuals on an as-needed basis.

24 21. **Exhibit 5, page -108.R (both charts and all text below the heading that begins**  
25 **with “Scope”).** This information reveals Google’s internal non-public profit, revenue, and  
26 financial calculations. These data sets are not otherwise publicly reported by the company and  
27 their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
28

1 advantage. Google's competitors could improperly utilize this internal, non-public data to modify  
2 or augment their business operations in an effort to compete unfairly against Google. Moreover,  
3 visibility into the trends in the data (i.e., figures across multiple years) gives Google's  
4 competitors improper insight into the financial health and future outlook of the Play business,  
5 which also arguably gives Google's competitors an unfair advantage.

6       **22. Exhibit 5, page -109.R (the figures in the columns with the headings**  
7 **beginning with “2017A” and “2018A”).** This text contains confidential, non-public  
8 information regarding Google’s agreements with non-party developers. Disclosure of this non-  
9 public information is likely to result in competitive harm to Google, as it reveals strategic  
10 decision-making which, for example, could give a competitor or potential business partner unfair  
11 leverage in competing against or negotiating with Google. Moreover, Google’s competitors  
12 could use this non-party information to unfairly target Google's developer partners and offer  
13 specific deal terms designed to undercut those offered by Google. This information reflects and  
14 is calculated from internal, non-public Google financial data. Google spends significant  
15 resources compiling and maintaining this valuable data, which is non-public, and if revealed to  
16 competitors and potential business counterparties, could be used to disadvantage and cause  
17 Google competitive harm by giving competitors insight into confidential Google financial  
18 information. Further, this information reflects sensitive, highly confidential characterizations by  
19 Google's internal business teams that, if revealed, could be referenced by potential counterparties  
20 in negotiations with Google to gain an unfair advantage against Google. Further, the disclosure  
21 of OEMs' highly confidential information would significantly harm OEMs' business. For  
22 example, OEMs' competitors could leverage this information to reap an unearned competitive  
23 advantage. They could exploit this information—that they otherwise would not have access to—  
24 to inform their own business strategies. To prevent these competitive harms from coming to  
25 fruition, OEMs proactively maintain the confidentiality of their strategic information, only  
26 disclosing it to a select group of individuals on an as-needed basis.

23. **Exhibit 5, page -111.R (between “higher 2023 spend” and “only due to”;  
between start of sentence and “incremental revenue share”; “share in 2023” and “for  
Google forward”; between “devices +” and “for devices with”).** This text contains  
confidential, non-public information regarding non-party developers, and implicates the non-  
parties’ confidentiality interests by purporting to reveal the nonparties’ confidential statements  
made during negotiations. Further, disclosure of this non-public information is likely to result in  
competitive harm to Google, as it reveals strategic decision-making, which, for example, could  
give a competitor or potential business partner unfair leverage in competing against or  
negotiating with Google. Moreover, Google’s competitors could use this non-party information  
to unfairly target Google’s partners. Further, this information reveals Google’s internal non-  
public profit, revenue, and financial calculations. These data sets are not otherwise publicly  
reported by the company and their disclosure is likely to cause Google competitive harm and  
give its competitors an unfair advantage. Google’s competitors could improperly utilize this  
internal, non-public data to modify or augment their business operations in an effort to compete  
unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
multiple years) gives Google’s competitors improper insight into the financial health and future  
outlook of the Play business, which also arguably gives Google’s competitors an unfair  
advantage.

24. **Exhibit 5, page -112.R (between start of sentence and “Browser search  
revenue”; between “GSA Widget” and “overall Search rev”; between start of sentence and  
“Search revenue share (as TODAY”; between start of sentence and “Search (as TODAY  
bonus”; between “bonus)” and “Play revenue share”; between “Play revenue share” and  
“of spend”); between “Xiaomi” and “for selected smaller”).** This text contains confidential,  
non-public information regarding Google’s agreements with non-party OEMs. Disclosure of this  
non-public information is likely to result in competitive harm to Google, as it reveals strategic  
decision-making which, for example, could give a competitor or potential business partner unfair  
leverage in competing against or negotiating with Google. Moreover, Google’s competitors



1 could use this non-party information to unfairly target Google's partners and offer specific deal  
2 terms designed to undercut those offered by Google.

3       25.     **Exhibit 5, page -113.R (between start of sentence and “GROSS Search rev**  
4 **share”; between start of sentence and “GROSS Search rev share (as TODAY”; between**  
5 **start of sentence and “GROSS Search rev share (no Play”; between “carriers to spend”**  
6 **and “(ramp)”;** between “Spend” and “of the incremental”). This text contains confidential,  
7 non-public information regarding Google’s agreements with non-party carriers. Disclosure of  
8 this non-public information is likely to result in competitive harm to Google, as it reveals  
9 strategic decision-making which, for example, could give a competitor or potential business  
10 partner unfair leverage in competing against or negotiating with Google. Moreover, Google’s  
11 competitors could use this non-party information to unfairly target Google's partners and offer  
12 specific deal terms designed to undercut those offered by Google.

13       26.     **Exhibit 5, page -115.R (between “spending the” and “in 2023”; between**  
14 **“Risk Hedging” and “search +”; between “search +” and “Play”; between “forward**  
15 **devices” and “search +”; between “search +” and “Play”; between “Search & assistant”**  
16 **and end of sentence; between “Transsion” and end of sentence; between “Hedge:” and**  
17 **“non covered”; between “revenue” and “of browser”; between “browser and” and “in**  
18 **Europe revenue;” between “on incremental” and “devices”; between “Hedge” and “non-**  
19 **covered Play”; between “actives)” and “in Search +”; between “in Search +” and “in Play**  
20 **in Lieu”; between “actives)” and “in Search +”; between “in Search +” and “in Play”;**  
21 **between “actives)” and “in Search to get”; between “up to spend” and “in co-marketing”).**  
22 This information reveals Google's internal non-public profit, revenue, and financial calculations.  
23 These data sets are not otherwise publicly reported by the company and their disclosure is likely  
24 to cause Google competitive harm and give its competitors an unfair advantage. Google's  
25 competitors could improperly utilize this internal, non-public data to modify or augment their  
26 business operations in an effort to compete unfairly against Google. Moreover, visibility into the  
27 trends in the data (i.e., figures across multiple years) gives Google's competitors improper insight  
28

1 into the financial health and future outlook of the Play business, which also arguably gives  
2 Google's competitors an unfair advantage. Further, the disclosure of OEMs' highly confidential  
3 information would significantly harm OEMs' business. For example, OEMs' competitors could  
4 leverage this information to reap an unearned competitive advantage. They could exploit this  
5 information—that they otherwise would not have access to—to inform their own business  
6 strategies. To prevent these competitive harms from coming to fruition, OEMs proactively  
7 maintain the confidentiality of their strategic information, only disclosing it to a select group of  
8 individuals on an as-needed basis.

9       27.     **Exhibit 5, page -116.R (between "investing" and "per device", between "on**  
10 **Android" and "in 2023"; all text below "Theoretical Break-even" and above "Pay-out",**  
11 **"Revenue uplift potential" and "App bounty savings opportunity"; all text in chart under**  
12 **"Pay-out"; between "Revenue uplift potential" and "Assuming 50% of"; between "varies**  
13 **by OEM" and end of sentence; "between "+\$2" and "Total"); between "Carrier devices**  
14 **only!" and "in marketing"; between "of which" and "to be spent specifically"; between "1P**  
15 **services e.g." and "revenue from 1P"; between "generated" and "revenue"; between "GFD**  
16 **is" and "more expensive"; between "LG" and "savings"; between "Other non CN OEMs"**  
17 **and "savings per device"; the dollar amount preceding "in marketing").** This text contains  
18 confidential, non-public information regarding Google's agreements with non-parties. Disclosure  
19 of this non-public information is likely to result in competitive harm to Google, as it reveals  
20 strategic decision-making which, for example, could give a competitor or potential business  
21 partner unfair leverage in competing against or negotiating with Google. Moreover, Google's  
22 competitors could use this non-party information to unfairly target Google's partners and offer  
23 specific deal terms designed to undercut those offered by Google. Further, this information  
24 reflects and is calculated from internal, non-public Google financial data. Google spends  
25 significant resources compiling and maintaining this valuable data, which is non-public, and if  
26 revealed to competitors and potential business counterparties, could be used to disadvantage and  
27 cause Google competitive harm by giving competitors insight into confidential Google financial  
28

1 information. Further, this information reflects sensitive, highly confidential characterizations by  
2 Google's internal business teams that, if revealed, could be referenced by potential counterparties  
3 in negotiations with Google to gain an unfair advantage against Google. Further, the disclosure  
4 of OEMs' highly confidential information would significantly harm OEMs' business. For  
5 example, OEMs' competitors could leverage this information to reap an unearned competitive  
6 advantage. They could exploit this information—that they otherwise would not have access to—  
7 to inform their own business strategies. To prevent these competitive harms from coming to  
8 fruition, OEMs proactively maintain the confidentiality of their strategic information, only  
9 disclosing it to a select group of individuals on an as-needed basis.

10       28.     **Exhibit 5, page -117.R (between “Google incremental” and “in 2023”; the**  
11 **bar chart underneath the heading “GDAF TAC Payments by Tier”; the dollar amounts in**  
12 **the columns with the headings “2018”, “2019”, “2020”, “2021”, “2022”, and “2023”; the**  
13 **dollar amounts to the right of the table at the bottom of the slide before “Search Revshare”**  
14 **and “Incr above”).** This information reflects and is calculated from internal, non-public Google  
15 financial data. Google spends significant resources compiling and maintaining this valuable data,  
16 which is non-public, and if revealed to competitors and potential business counterparties, could  
17 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
18 confidential Google financial information. Further, this information reflects sensitive, highly  
19 confidential characterizations by Google's internal business teams that, if revealed, could be  
20 referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
21 against Google.

22       29.     **Exhibit 5, page -118.R (between “will reach” and “in 2023”; between “in**  
23 **2023” and “from Play”; between “from Play” and “Search”; all figures in the columns with**  
24 **the headings “2018A”; “2019E”; “2020F”; “2021F”; “2022F”; 2023F” and “Two Year**  
25 **Term”; and between “reinvestment is” and “in each year”).** This information reflects and is  
26 calculated from internal, non-public Google financial data. Google spends significant resources  
27 compiling and maintaining this valuable data, which is non-public, and if revealed to competitors  
28

1 and potential business counterparties, could be used to disadvantage and cause Google  
2 competitive harm by giving competitors insight into confidential Google financial information.  
3 Further, this information reflects sensitive, highly confidential characterizations by Google's  
4 internal business teams that, if revealed, could be referenced by potential counterparties in  
5 negotiations with Google to gain an unfair advantage against Google.

6       **30. Exhibit 5, page -121.R (between “will reach” and “in 2023”; dollar amounts**  
7 **in the columns with the headings “2018A”, “2019E”, “2020F”, “2021F”, “2022F”, and**  
8 **“2023F”; between “be between” and “GFWD”; between “enrollment of” and the end of the**  
9 **sentence; between “bonus rates” and “for most”; between “OEMs and” and “for**  
10 **Carriers”).** This information reflects and is calculated from internal, non-public Google  
11 financial data. Google spends significant resources compiling and maintaining this valuable data,  
12 which is non-public, and if revealed to competitors and potential business counterparties, could  
13 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
14 confidential Google financial information. Further, this information reflects sensitive, highly  
15 confidential characterizations by Google's internal business teams that, if revealed, could be  
16 referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
17 against Google. Further, the disclosure of OEMs' highly confidential information would  
18 significantly harm OEMs' business. For example, OEMs' competitors could leverage this  
19 information to reap an unearned competitive advantage. They could exploit this information—  
20 that they otherwise would not have access to—to inform their own business strategies. To  
21 prevent these competitive harms from coming to fruition, OEMs proactively maintain the  
22 confidentiality of their strategic information, only disclosing it to a select group of individuals on  
23 an as-needed basis.

24       **31. Exhibit 5, page -122.R (between “to spend” and “to cover”; between “to**  
25 **cover” and “in key”; between “deals as-is” and “unsc’rd”; between “unsc’rd” and**  
26 **“Revshare” under heading “Case 1”; all three green and yellow columns; text before**  
27 **“Revshare” in both blue text boxes”; between “GDAF proposal” and “unsc’rd”; between**  
28

1 **“unsc’rd” and “Revshare” under heading “Case 2”; between “RSAs expire” and**  
2 **“unsc’rd”; between “unsc’rd” and “Revshare” under heading “Case 3”).** This text contains  
3 confidential, non-public information regarding Google’s agreements with non-party carriers.  
4 Disclosure of this non-public information is likely to result in competitive harm to Google, as it  
5 reveals strategic decision-making which, for example, could give a competitor or potential  
6 business partner unfair leverage in competing against or negotiating with Google. Moreover,  
7 Google’s competitors could use this non-party information to unfairly target Google's carrier  
8 partners and offer specific deal terms designed to undercut those offered by Google. This  
9 information reflects and is calculated from internal, non-public Google financial data. Google  
10 spends significant resources compiling and maintaining this valuable data, which is non-public,  
11 and if revealed to competitors and potential business counterparties, could be used to  
12 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
13 Google financial information. Further, this information reflects sensitive, highly confidential  
14 characterizations by Google's internal business teams that, if revealed, could be referenced by  
15 potential counterparties in negotiations with Google to gain an unfair advantage against Google.  
16 Further, the disclosure of OEMs' highly confidential information would significantly harm  
17 OEMs' business. For example, OEMs' competitors could leverage this information to reap an  
18 unearned competitive advantage. They could exploit this information—that they otherwise  
19 would not have access to—to inform their own business strategies. To prevent these competitive  
20 harms from coming to fruition, OEMs proactively maintain the confidentiality of their strategic  
21 information, only disclosing it to a select group of individuals on an as-needed basis.

22       **32. Exhibit 5, page -123.R (the dollar amounts in the columns with the headings**  
23 **“2018A”, “2019E”, “2020F”, “2021F”, “2022F” and “2023F”).** This information reveals  
24 Google's internal non-public profit, revenue, and financial calculations. These data sets are not  
25 otherwise publicly reported by the company and their disclosure is likely to cause Google  
26 competitive harm and give its competitors an unfair advantage. Google's competitors could  
27 improperly utilize this internal, non-public data to modify or augment their business operations  
28

1 in an effort to compete unfairly against Google. Moreover, visibility into the trends in the data  
2 (i.e., figures across multiple years) gives Google's competitors improper insight into the financial  
3 health and future outlook of the Play business, which also arguably gives Google's competitors  
4 an unfair advantage.

5 **Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 7**  
6 **(GOOG-PLAY-000338400.R)**

7 33. **Exhibit 7, Page -401 (between “on track to deliver” and “in revenue\*”;**  
8 **between “revenue\*” and “and approximately”; between “and approximately” and “of**  
9 **Alphabet H1’2020 operating profit”; between “momentum revenue forecast” and “by**  
10 **2025)”;** between “grow beyond momentum to” and “by 2025. 3 key”; between “3 key areas  
11 of opportunity:” and end of bullet-point list; and between “a path to grow” and “above the  
12 momentum forecast 5 years out.”). This information reveals Google's internal non-public  
13 profit, revenue, and financial calculations for 2020 and as projected forward through 2025, and  
14 Google’s internal strategic priorities for the same period. These data sets are not otherwise  
15 publicly reported by the company and their disclosure is likely to cause Google competitive harm  
16 and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
17 internal, non-public data to modify or augment their business operations in an effort to compete  
18 unfairly against Google. Moreover, visibility into the trends in the data (i.e., figures across  
19 multiple years) gives Google’s competitors improper insight into the financial health and future  
20 outlook of the Play business, which also arguably gives Google's competitors an unfair  
21 advantage. Finally, this text reflects confidential and recent business strategy considerations by  
22 Google, including considered Google’s internal strategic priorities for Google through 2025. If  
23 publicly revealed, this information could cause Google competitive harm by giving other parties  
24 insight into Google's strategic considerations and plans, and thus a competitive advantage over  
25 Google in ongoing or future business negotiations and commercial strategy.

26 **Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 8**  
27 **(Excerpt of Rosenberg Tr.)**  
28

34. **Exhibit 8, Pages -387-89 (between “It had been” and “. There was –”; between “in January where it went up I think” and “, but I don’t remember the exact number”; between “And when you say” and “you mean in the range”; between “into the range of between” and “A. Correct.”; between “I’m doing some math. I think – I think it would be” and “shares? A. Correct.”; between “What is the approximate time frame over which those shares will vest? A. I think it would be” and “I believe.”; between “Q. So if Google closed today at \$2,772 and you have” and “am I doing the math right”; between “to understand that that’s” and “worth of Google stock?”; between “Approximately how many vested shares do you hold?” and “Q. Great.” ; between “put on file with the SEC?” and “Q. I don’t know actually.”; between “Q. I don’t know actually.” and end of page).** This text contains a discussion of the specific numbers, dollar values, and schedules associated with an individual Google employee’s salary and stock holdings. Disclosure of this personally identifying and highly sensitive personal financial information would violate that individual’s reasonable expectation of privacy in their personal information shared privately with Google. Google does not seek to redact the *fact* that the employee receives a salary or holds Google stock, which is relevant to the Motion. But Google does seek to redact exact vesting schedule information, amount, and dollar value of the employee’s salary and stock holdings. No public interest is served by the public disclosure of that sensitive, personal information.

**Plaintiffs’ Omnibus Oppositions to Defendants’ Omnibus Motions in Limine – Exhibit 9  
(GOOG-PLAY-007819062)**

35. **Exhibit 9, Page -077 (green column under “BYOB”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.



1           36.     **Exhibit 9, Page -078 (between “Costs range from” and end of line; all figures**  
2 **above the three blue columns).** This information contains non-public information regarding  
3 Google’s confidential non-public internal strategic considerations related to creating value for  
4 and attracting developers to the Play Store. This information has never been disclosed publicly.  
5 Disclosure of this information would adversely impact Google’s current competitive position by  
6 enabling Google’s competitors to mimic its confidential strategies in an effort to attract  
7 developers away from Google.

8           37.     **Exhibit 9, Page -081 (all text to the right of “Est. Margin Cost”; between**  
9 **“Cost at” and “-assuming some behavior”; between “changes in games” and “apps”;**  
10 **between “apps;” and “games) Content Creator”; between “apps such as” and “who have a**  
11 **large creator platform”; between “usually published rates)” and “India program”;**  
12 **between “Content creator:” and “margin against existing”).** This information reveals  
13 Google's internal non-public profit and financial calculations. These data sets are not otherwise  
14 publicly reported by the company and their disclosure is likely to cause Google competitive harm  
15 and give its competitors an unfair advantage. Google's competitors could improperly utilize this  
16 internal, non-public data to modify or augment their business operations in an effort to compete  
17 unfairly against Google. Moreover, this text contains confidential, non-public information  
18 regarding non-party developers, and implicates the non-party’s confidentiality interests, by  
19 revealing the identity of Google business partners who are not party to this litigation, and who  
20 have a reasonable expectation that Google will maintain the confidentiality of contractual terms  
21 and its own confidential statements made during negotiations.

22           38.     **Exhibit 9, Page -083 (between “change would be” and “for apps”; between**  
23 **“for apps” and “for games”; all figures in the table below subheaders; between “devs shift**  
24 **just” and “of IAP spend”; between “Cost by” and “for apps”; between “for apps” and “for**  
25 **games);” between “smaller tiers does not” and “this is because”; between “also means the”**  
26 **and “for” between “for” and “for games for the smallest”; between “subs give will be” and**  
27 **“for apps”; between “notional give” and “the size”; between “the size” and “for apps vs”;**  
28

1 between “for apps vs” and “for games), but”; between “with subs is” and “compared to”;  
2 between “compared to” and “for games”; between “tiers are actually” and “and”; between  
3 “and” and “as we see the”; and between “richness for upper tiers” and “I have a  
4 hypothesis”). This information reflects and is calculated from internal, non-public Google  
5 financial data regarding the financial impact of the service fee for subscriptions on developers.  
6 Google spends significant resources compiling and maintaining this valuable data, which is non-  
7 public, and if revealed to competitors and potential business counterparties, could be used to  
8 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
9 Google financial information. Further, this information reflects sensitive, highly confidential  
10 characterizations by Google's internal business teams that, if revealed, could be referenced by  
11 potential counterparties in negotiations with Google to gain an unfair advantage against Google.

12 39. **Exhibit 9, Page -084 (between “smaller tiers does not” and “this is because”;**  
13 **between “also means the” and “for”; between “for” and “for games for the smallest”;**  
14 **between “subs give will be” and “for apps”; between “notional give” and “the size”;**  
15 **between “the size” and “for apps vs”; between “for apps vs” and “for games), but”;**  
16 **between “with subs is” and “compared to”; between “compared to” and “for games”;**  
17 **between “tiers are actually” and “and”; between “and” and “as we see the”; and between**  
18 **“richness for upper tiers” and “I have a hypothesis”).** This information reflects and is  
19 calculated from internal, non-public Google financial data regarding the financial impact of the  
20 service fee for subscriptions on developers. Google spends significant resources compiling and  
21 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
22 business counterparties, could be used to disadvantage and cause Google competitive harm by  
23 giving competitors insight into confidential Google financial information. Further, this  
24 information reflects sensitive, highly confidential characterizations by Google's internal business  
25 teams that, if revealed, could be referenced by potential counterparties in negotiations with  
26 Google to gain an unfair advantage against Google.

1           40.     **Exhibit 9, Page -085 (all text in row to the right of “not published”).** This  
2 information contains non-public information regarding Google’s confidential non-public internal  
3 strategic considerations related to creating value for and attracting developers to the Play Store.  
4 Further, this text contains confidential, non-public information regarding non-party developers,  
5 and implicates the non-party’s confidentiality interests, by revealing the identity of Google  
6 business partners who are not party to this litigation, and who have a reasonable expectation that  
7 Google will maintain the confidentiality of contractual terms and its own confidential statements  
8 made during negotiations. Further, disclosure of this non-public information is likely to result in  
9 competitive harm to Google, as it reveals strategic decision-making, which, for example, could  
10 give a competitor or potential business partner unfair leverage in competing against or  
11 negotiating with Google. Moreover, Google’s competitors could use this non-party information  
12 to unfairly target Google’s developer partners.

13           41.     **Exhibit 9, Page -086 (between “Est. Margin Cost” and “- very few of these”;**  
14 **between “Cost at” and “-assuming some behavior”; between “changes in games” and**  
15 **“apps”; between “apps;” and “games) Content Creator”; between “apps such as” and**  
16 **“who have a large creator platform”; between “usually published rates)” and “India**  
17 **program”; between “Content creator:” and “margin against existing”).** This information  
18 reveals Google's internal non-public profit and financial calculations. These data sets are not  
19 otherwise publicly reported by the company and their disclosure is likely to cause Google  
20 competitive harm and give its competitors an unfair advantage. Google's competitors could  
21 improperly utilize this internal, non-public data to modify or augment their business operations  
22 in an effort to compete unfairly against Google. Moreover, this text contains confidential, non-  
23 public information regarding non-party developers, and implicates the non-party’s confidentiality  
24 interests, by revealing the identity of Google business partners who are not party to this  
25 litigation, and who have a reasonable expectation that Google will maintain the confidentiality of  
26 contractual terms and its own confidential statements made during negotiations.

42. **Exhibit 9, Page -088 (text below “video”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

43. **Exhibit 9, Page -112 (between “Effective Fee \*\*” and “-15%”).** This information contains non-public information regarding Google’s confidential non-public internal strategic considerations related to creating value for and attracting developers to the Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google’s current competitive position by enabling Google’s competitors to mimic its confidential strategies in an effort to attract developers away from Google.

44. **Exhibit 9, Page -120 (between “Est. Margin Cost” and “- very few of these”; between “Cost at” and “-assuming some behavior”; between “changes in games” and “apps”; between “apps;” and “games) Content Creator”; between “apps such as” and “who have a large creator platform”; between “usually published rates)” and “India program”; between “Content creator:” and “margin against existing”).** This information reveals Google's internal non-public profit and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Google competitive harm and give its competitors an unfair advantage. Google's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Google. Moreover, this text contains confidential, non-public information regarding non-party developers, and implicates the non-party’s confidentiality interests, by revealing the identity of Google business partners who are not party to this litigation, and who have a reasonable expectation that Google will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

1           45.     **Exhibit 9, Page -122 (between “(min.” and “Accommodates apps that”;**  
2 **between “payout (min.” and “Extend creator”).** This information contains non-public  
3 information regarding Google’s confidential non-public internal strategic considerations related  
4 to creating value for and attracting developers to the Play Store. This information has never been  
5 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
6 competitive position by enabling Google’s competitors to mimic its confidential strategies in an  
7 effort to attract developers away from Google.

8           46.     **Exhibit 9, Page -123 (between “Cost at” and “-assuming some behavior”;**  
9 **between “changes in games” and “apps”; between “apps;” and “games) Content Creator”;**  
10 **between “apps such as” and “who have a large creator platform”; between “usually**  
11 **published rates)” and “India program”; between “Content creator:” and “margin against**  
12 **existing”).** This information reveals Google's internal non-public profit and financial  
13 calculations. These data sets are not otherwise publicly reported by the company and their  
14 disclosure is likely to cause Google competitive harm and give its competitors an unfair  
15 advantage. Google's competitors could improperly utilize this internal, non-public data to modify  
16 or augment their business operations in an effort to compete unfairly against Google. Moreover,  
17 this text contains confidential, non-public information regarding non-party developers, and  
18 implicates the non-party’s confidentiality interests, by revealing the identity of Google business  
19 partners who are not party to this litigation, and who have a reasonable expectation that Google  
20 will maintain the confidentiality of contractual terms and its own confidential statements made  
21 during negotiations.

22           47.     **Exhibit 9, Page -125 (all developers below “Match” in first column).** This text  
23 contains confidential, non-public information regarding non-party developers, and implicates the  
24 non-party’s confidentiality interests, by revealing the identity of Google business partners who  
25 are not party to this litigation, and who have a reasonable expectation that Google will maintain  
26 the confidentiality of contractual terms and its own confidential statements made during  
27 negotiations. Further, disclosure of this non-public information is likely to result in competitive  
28

1 harm to Google, as it reveals strategic decision-making, which, for example, could give a  
2 competitor or potential business partner unfair leverage in competing against or negotiating with  
3 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
4 Google's developer partners.

5 **48. Exhibit 9, Page -126 (all developers besides "Bandcamp" in first column).**

6 This text contains confidential, non-public information regarding non-party developers, and  
7 implicates the non-party's confidentiality interests, by revealing the identity of Google business  
8 partners who are not party to this litigation, and who have a reasonable expectation that Google  
9 will maintain the confidentiality of contractual terms and its own confidential statements made  
10 during negotiations. Further, disclosure of this non-public information is likely to result in  
11 competitive harm to Google, as it reveals strategic decision-making, which, for example, could  
12 give a competitor or potential business partner unfair leverage in competing against or  
13 negotiating with Google. Moreover, Google's competitors could use this non-party information  
14 to unfairly target Google's developer partners.

15 **49. Exhibit 9, Page -126 (all three figures in the "Tomorrow" column with**  
16 **"(min)" next to the figure).** This information contains non-public information regarding  
17 Google's confidential non-public internal strategic considerations related to creating value for  
18 and attracting developers to the Play Store. This information has never been disclosed publicly.  
19 Disclosure of this information would adversely impact Google's current competitive position by  
20 enabling Google's competitors to mimic its confidential strategies in an effort to attract  
21 developers away from Google.

22 **50. Exhibit 9, Page -127 (all developers in first column).** This text contains  
23 confidential, non-public information regarding non-party developers, and implicates the non-  
24 party's confidentiality interests, by revealing the identity of Google business partners who are  
25 not party to this litigation, and who have a reasonable expectation that Google will maintain the  
26 confidentiality of contractual terms and its own confidential statements made during  
27 negotiations. Further, disclosure of this non-public information is likely to result in competitive  
28

1 harm to Google, as it reveals strategic decision-making, which, for example, could give a  
2 competitor or potential business partner unfair leverage in competing against or negotiating with  
3 Google. Moreover, Google's competitors could use this non-party information to unfairly target  
4 Google's developer partners.

5       **51. Exhibit 9, Page -127 (all figures in the "Tomorrow" column).** This information  
6 contains non-public information regarding Google's confidential non-public internal strategic  
7 considerations related to creating value for and attracting developers to the Play Store. This  
8 information has never been disclosed publicly. Disclosure of this information would adversely  
9 impact Google's current competitive position by enabling Google's competitors to mimic its  
10 confidential strategies in an effort to attract developers away from Google.

11       **52. Exhibit 9, Page -130 (figure below "10%" in last blue column).** This  
12 information contains non-public information regarding Google's confidential non-public internal  
13 strategic considerations related to creating value for and attracting developers to the Play Store.  
14 This information has never been disclosed publicly. Disclosure of this information would  
15 adversely impact Google's current competitive position by enabling Google's competitors to  
16 mimic its confidential strategies in an effort to attract developers away from Google.

17       **53. Exhibit 9, Page -131 (between "content payout" and "Accommodates apps  
18 that").** This information contains non-public information regarding Google's confidential non-  
19 public internal strategic considerations related to creating value for and attracting developers to  
20 the Play Store. This information has never been disclosed publicly. Disclosure of this  
21 information would adversely impact Google's current competitive position by enabling Google's  
22 competitors to mimic its confidential strategies in an effort to attract developers away from  
23 Google.

24       **54. Exhibit 9, Page -132 (figure below "10%" in blue column).** This information  
25 contains non-public information regarding Google's confidential non-public internal strategic  
26 considerations related to creating value for and attracting developers to the Play Store. This  
27 information has never been disclosed publicly. Disclosure of this information would adversely  
28



1 impact Google's current competitive position by enabling Google's competitors to mimic its  
2 confidential strategies in an effort to attract developers away from Google.

3 55. **Exhibit 9, Page -133 (figure below "10%" in blue column).** This information  
4 contains non-public information regarding Google's confidential non-public internal strategic  
5 considerations related to creating value for and attracting developers to the Play Store. This  
6 information has never been disclosed publicly. Disclosure of this information would adversely  
7 impact Google's current competitive position by enabling Google's competitors to mimic its  
8 confidential strategies in an effort to attract developers away from Google.

9 56. **Exhibit 9, Page -134 (figure below "15%" in blue column).** This information  
10 contains non-public information regarding Google's confidential non-public internal strategic  
11 considerations related to creating value for and attracting developers to the Play Store. This  
12 information has never been disclosed publicly. Disclosure of this information would adversely  
13 impact Google's current competitive position by enabling Google's competitors to mimic its  
14 confidential strategies in an effort to attract developers away from Google.

15 57. **Exhibit 9, Page -135 (figure below "10%" in blue column).** This information  
16 contains non-public information regarding Google's confidential non-public internal strategic  
17 considerations related to creating value for and attracting developers to the Play Store. This  
18 information has never been disclosed publicly. Disclosure of this information would adversely  
19 impact Google's current competitive position by enabling Google's competitors to mimic its  
20 confidential strategies in an effort to attract developers away from Google.

21 58. **Exhibit 9, Page -136 (figure below "10%" in blue column).** This information  
22 contains non-public information regarding Google's confidential non-public internal strategic  
23 considerations related to creating value for and attracting developers to the Play Store. This  
24 information has never been disclosed publicly. Disclosure of this information would adversely  
25 impact Google's current competitive position by enabling Google's competitors to mimic its  
26 confidential strategies in an effort to attract developers away from Google.

**Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 10**  
**(GOOG-PLAY-011450558)**

59. **Exhibit 10, Page -639 (in the bullet point “Policy”, between “and funding” and the end of the sentence; between “pushed to change” and the end of the sentence).** This information contains non-public and confidential data regarding policies and developer relations on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

60. **Exhibit 10, Page -639 (underneath heading beginning with “NOTE: GAPP”, the text in the first bullet point).** This information contains non-public and confidential data regarding policies and developer relations on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S. developers.

61. **Exhibit 10, Page -639 (in the bullet point titled” Content Delivery Fees”, between “Talking Point]:” and “one area”, between “issue of” and the end of the sentence.)** This information contains non-public and confidential data regarding policies and developer relations on Google Play. This information has never been disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Google’s app store competitors, for example by influencing how those app stores market themselves to U.S.

1 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
2 developers.

3       62.     **Exhibit 10, Page -639 (the text in the three sub-bullet points to the bullet**  
4 **point titled” Content Delivery Fees”)**. This information contains non-public and confidential  
5 data regarding policies and developer relations on Google Play. This information has never been  
6 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
7 revealed, this information could influence the competitive decision-making and business  
8 strategies employed by Google’s app store competitors, for example by influencing how those  
9 app stores market themselves to U.S. developers and how they distinguish themselves from  
10 Google Play in the eyes of U.S. developers.

11       63.     **Exhibit 10, Page -639 (the text following “Disney Upfront and Broadcast”)**.  
12 This information contains non-public and confidential data regarding policies and developer  
13 relations on Google Play. This information has never been disclosed publicly and the Google  
14 Play product team treats it as strictly confidential. If publicly revealed, this information could  
15 influence the competitive decision-making and business strategies employed by Google’s app  
16 store competitors, for example by influencing how those app stores market themselves to U.S.  
17 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
18 developers. This text also contains confidential, non-public information regarding Google’s  
19 agreements with non-party developers. Disclosure of this non-public information is likely to  
20 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
21 could give a competitor or potential business partner unfair leverage in competing against or  
22 negotiating with Google. Moreover, Google’s competitors could use this non-party information  
23 to unfairly target Google’s developer partners and offer specific deal terms designed to undercut  
24 those offered by Google.

25       64.     **Exhibit 10, Page -639 (the text following “Platforms and Ecosystems”)**. This  
26 information contains non-public and confidential data regarding policies and developer relations  
27 on Google Play. This information has never been disclosed publicly and the Google Play product  
28

1 team treats it as strictly confidential. If publicly revealed, this information could influence the  
2 competitive decision-making and business strategies employed by Google's app store  
3 competitors, for example by influencing how those app stores market themselves to U.S.  
4 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
5 developers. This text also contains confidential, non-public information regarding Google's  
6 agreements with non-party developers. Disclosure of this non-public information is likely to  
7 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
8 could give a competitor or potential business partner unfair leverage in competing against or  
9 negotiating with Google. Moreover, Google's competitors could use this non-party information  
10 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
11 those offered by Google.

12 **Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 12**  
13 **(GOOG-PLAY-011675561)**

14 65. **Exhibit 12, Page -629 (between “target of” and “incremental”; between “is**  
15 **now” and the end of the sentence”).** This information reveals Google's internal non-public  
16 profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by  
17 the company and their disclosure is likely to cause Google competitive harm and give its  
18 competitors an unfair advantage. Google's competitors could improperly utilize this internal,  
19 non-public data to modify or augment their business operations in an effort to compete unfairly  
20 against Google. Moreover, visibility into the trends in the data (i.e., figures across multiple  
21 years) gives Google's competitors improper insight into the financial health and future outlook of  
22 the Play business, which also arguably gives Google's competitors an unfair advantage.

23 66. **Exhibit 12, Page -631 (the dollar figures in the subheadings, “1. FOP**  
24 **Launches”, “2. “eWallet Activation”, “3. Global Pay”, and “4. Live Commerce”; the chart**  
25 **under subheading “1. FOP Launches”; the figures under the subheading “2. eWallet**  
26 **Activation”; the text in the notes underneath the heading “The 4 launches this year are:”)**  
27 This information reflects and is calculated from internal, non-public Google financial data.  
28

1 Google spends significant resources compiling and maintaining this valuable data, which is non-  
2 public, and if revealed to competitors and potential business counterparties, could be used to  
3 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
4 Google financial information. Further, this information reflects sensitive, highly confidential  
5 characterizations by Google's internal business teams that, if revealed, could be referenced by  
6 potential counterparties in negotiations with Google to gain an unfair advantage against Google.  
7 Further, this text contains confidential, non-public information regarding Google's agreements  
8 with non-party developers. Disclosure of this non-public information is likely to result in  
9 competitive harm to Google, as it reveals strategic decision-making which, for example, could  
10 give a competitor or potential business partner unfair leverage in competing against or  
11 negotiating with Google. Moreover, Google's competitors could use this non-party information  
12 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
13 those offered by Google.

14 67. **Exhibit 12, Page -634 (in the notes below the slide, between "Purchasers by"**  
15 **and "and Transactions"; between "Transactions by" and "this year"; between "year with"**  
16 **and "of ShopeePay")** This information contains non-public and confidential data regarding  
17 commerce programs on Google Play. This information has never been disclosed publicly and the  
18 Google Play product team treats it as strictly confidential. If publicly revealed, this information  
19 could influence the competitive decision-making and business strategies employed by Google's  
20 app store competitors, for example by influencing how those app stores market themselves to  
21 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S.  
22 developers. This text contains confidential, non-public information regarding Google's  
23 agreements with non-party developers. Disclosure of this non-public information is likely to  
24 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
25 could give a competitor or potential business partner unfair leverage in competing against or  
26 negotiating with Google. Moreover, Google's competitors could use this non-party information  
27  
28

1 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
2 those offered by Google.

3       **68. Exhibit 12, Page -635 (the data underneath the subheading “Campaign**  
4 **Results”; between “total of” and “during the”; between “campaign period” and**  
5 **“achievement”; the percentage figures between “it drove” and the end of the sentence”)**

6 This information contains non-public and confidential data regarding commerce programs on  
7 Google Play. This information has never been disclosed publicly and the Google Play product  
8 team treats it as strictly confidential. If publicly revealed, this information could influence the  
9 competitive decision-making and business strategies employed by Google’s app store  
10 competitors, for example by influencing how those app stores market themselves to U.S.  
11 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
12 developers. This text contains confidential, non-public information regarding Google’s  
13 agreements with non-party developers. Disclosure of this non-public information is likely to  
14 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
15 could give a competitor or potential business partner unfair leverage in competing against or  
16 negotiating with Google. Moreover, Google’s competitors could use this non-party information  
17 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
18 those offered by Google.

19       **69. Exhibit 12, Page -636 (the text and figures below the images on the slide;**  
20 **between “volume by” and “YoY;” between “on Play by” and “YoY”; between start of**  
21 **sentence and “for spend;” between “for spend” and “for NPUs” and between “NPUs and”**  
22 **and “for RPUs”)** This information contains non-public and confidential data regarding  
23 commerce programs on Google Play. This information has never been disclosed publicly and the  
24 Google Play product team treats it as strictly confidential. If publicly revealed, this information  
25 could influence the competitive decision-making and business strategies employed by Google’s  
26 app store competitors, for example by influencing how those app stores market themselves to  
27 U.S. developers and how they distinguish themselves from Google Play in the eyes of U.S.  
28

1 developers. This text contains confidential, non-public information regarding Google's  
2 agreements with non-party developers. Disclosure of this non-public information is likely to  
3 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
4 could give a competitor or potential business partner unfair leverage in competing against or  
5 negotiating with Google. Moreover, Google's competitors could use this non-party information  
6 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
7 those offered by Google. The disclosure of developer's highly confidential information would  
8 significantly harm to the developer's business. For example, developer's competitors could  
9 leverage this information to reap an unearned competitive advantage. They could exploit this  
10 information—that they otherwise would not have access to—to inform their own business  
11 strategies. To prevent these competitive harms from coming to fruition, the developer proactively  
12 maintains the confidentiality of its strategic information, only disclosing it to a select group of  
13 individuals on an as-needed basis.

14       70.     **Exhibit 12, Page -638 (in the notes below the slide, from the beginning of the**  
15 **sentence to “page views”; from “highest is” to the end of the sentence; between “uniques**  
16 **is” and “(Disney/Naver)”; between “(Disney/Naver” and the end of the sentence.)** This  
17 information contains non-public and confidential data regarding commerce programs on Google  
18 Play. This information has never been disclosed publicly and the Google Play product team  
19 treats it as strictly confidential. If publicly revealed, this information could influence the  
20 competitive decision-making and business strategies employed by Google's app store  
21 competitors, for example by influencing how those app stores market themselves to U.S.  
22 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
23 developers. This text contains confidential, non-public information regarding Google's  
24 agreements with non-party developers. Disclosure of this non-public information is likely to  
25 result in competitive harm to Google, as it reveals strategic decision-making which, for example,  
26 could give a competitor or potential business partner unfair leverage in competing against or  
27 negotiating with Google. Moreover, Google's competitors could use this non-party information  
28



1 to unfairly target Google's developer partners and offer specific deal terms designed to undercut  
2 those offered by Google.

3       71.     **Exhibit 12, Page -640 (all figures in the columns “Est for H1 Activities”,**  
4 **“EOY Outlook”, and “Original Target”; in the row “eWallet Activations”, from “revenue**  
5 **estimates” to the end of the sentence; in the row “PayPal Activations, between “for H2 w/”**  
6 **and “in partner”; in the row “Total”, between “target was” and “to be”)** This information  
7 contains non-public and confidential data regarding commerce programs on Google Play. This  
8 information has never been disclosed publicly and the Google Play product team treats it as  
9 strictly confidential. If publicly revealed, this information could influence the competitive  
10 decision-making and business strategies employed by Google’s app store competitors, for  
11 example by influencing how those app stores market themselves to U.S. developers and how  
12 they distinguish themselves from Google Play in the eyes of U.S. developers. This text contains  
13 confidential, non-public information regarding Google’s agreements with non-party developers.  
14 Disclosure of this non-public information is likely to result in competitive harm to Google, as it  
15 reveals strategic decision-making which, for example, could give a competitor or potential  
16 business partner unfair leverage in competing against or negotiating with Google. Moreover,  
17 Google’s competitors could use this non-party information to unfairly target Google's developer  
18 partners and offer specific deal terms designed to undercut those offered by Google.

19     **Plaintiffs’ Omnibus Oppositions to Defendants’ Omnibus Motions in Limine– Exhibit 13**  
20                   **(GOOG-PLAY-007868187)**

21       72.     **Exhibit 13, Page -214 (the chart on the left side of the slide).** This information  
22 contains non-public and confidential data regarding app growth and performance on Google  
23 Play. This information has never been disclosed publicly and the Google Play product team  
24 treats it as strictly confidential. If publicly revealed, this information could influence the  
25 competitive decision-making and business strategies employed by Google’s app store  
26 competitors, for example by influencing how those app stores market themselves to U.S.

1 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
2 developers.

3       73.     **Exhibit 13, Page -215 (the innermost circle of the graphic).** This information  
4 contains non-public and confidential data regarding app growth and performance on Google  
5 Play. This information has never been disclosed publicly and the Google Play product team  
6 treats it as strictly confidential. If publicly revealed, this information could influence the  
7 competitive decision-making and business strategies employed by Google's app store  
8 competitors, for example by influencing how those app stores market themselves to U.S.  
9 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
10 developers. Further, this information reveals Google's internal non-public profit, revenue, and  
11 financial calculations. These data sets are not otherwise publicly reported by the company and  
12 their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
13 advantage. Google's competitors could improperly utilize this internal, non-public data to modify  
14 or augment their business operations in an effort to compete unfairly against Google. Moreover,  
15 visibility into the trends in the data (i.e., figures across multiple years) gives Google's  
16 competitors improper insight into the financial health and future outlook of the Play business,  
17 which also arguably gives Google's competitors an unfair advantage.

18       74.     **Exhibit 13, Page -219 (in the notes, between "cost of" and "in first year").**  
19 This information contains non-public and confidential data regarding app growth and  
20 performance on Google Play. This information has never been disclosed publicly and the Google  
21 Play product team treats it as strictly confidential. If publicly revealed, this information could  
22 influence the competitive decision-making and business strategies employed by Google's app  
23 store competitors, for example by influencing how those app stores market themselves to U.S.  
24 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
25 developers. Further, this information reveals Google's internal non-public profit, revenue, and  
26 financial calculations. These data sets are not otherwise publicly reported by the company and  
27 their disclosure is likely to cause Google competitive harm and give its competitors an unfair  
28

1 advantage. Google's competitors could improperly utilize this internal, non-public data to modify  
2 or augment their business operations in an effort to compete unfairly against Google. Moreover,  
3 visibility into the trends in the data (i.e., figures across multiple years) gives Google's  
4 competitors improper insight into the financial health and future outlook of the Play business,  
5 which also arguably gives Google's competitors an unfair advantage.

6       75.     **Exhibit 13, Page -225 (all content in slide under the heading “Level 3 - Tiered**  
7 **RevShare - 4 dimensions”)**. This information contains non-public information regarding  
8 Google’s confidential non-public internal strategic considerations related to creating value for  
9 and attracting developers to the Play Store. This information has never been disclosed publicly.  
10 Disclosure of this information would adversely impact Google’s current competitive position by  
11 enabling Google’s competitors to mimic its confidential strategies in an effort to attract  
12 developers away from Google. This information also contains non-public and confidential data  
13 regarding internal considerations of features regarding billing on Google Play. This information  
14 has never been disclosed publicly and the Google Play product team treats it as strictly  
15 confidential. If publicly revealed, this information could influence the competitive decision-  
16 making and business strategies employed by Google’s app store competitors, for example by  
17 influencing how those app stores market themselves to U.S. developers and how they distinguish  
18 themselves from Google Play in the eyes of U.S. developers.

19       76.     **Exhibit 13, Page -228 (the figure underneath the heading “Segmented Hybrid**  
20 **All-Inclusive + Billing Optionality”)**. This information contains non-public information  
21 regarding Google’s confidential non-public internal strategic considerations related to creating  
22 value for and attracting developers to the Play Store. This information has never been disclosed  
23 publicly. Disclosure of this information would adversely impact Google’s current competitive  
24 position by enabling Google’s competitors to mimic its confidential strategies in an effort to  
25 attract developers away from Google. This information also contains non-public and confidential  
26 data regarding internal considerations of features regarding billing on Google Play. This  
27 information has never been disclosed publicly and the Google Play product team treats it as  
28

1 strictly confidential. If publicly revealed, this information could influence the competitive  
2 decision-making and business strategies employed by Google's app store competitors, for  
3 example by influencing how those app stores market themselves to U.S. developers and how  
4 they distinguish themselves from Google Play in the eyes of U.S. developers.

5       77.     **Exhibit 13, Page -229 (the figure underneath the heading "Segmented Hybrid**  
6 **All-Inclusive + Billing Optionality")**. This information contains non-public information  
7 regarding Google's confidential non-public internal strategic considerations related to creating  
8 value for and attracting developers to the Play Store. This information has never been disclosed  
9 publicly. Disclosure of this information would adversely impact Google's current competitive  
10 position by enabling Google's competitors to mimic its confidential strategies in an effort to  
11 attract developers away from Google. This information also contains non-public and confidential  
12 data regarding internal considerations of features regarding billing on Google Play. This  
13 information has never been disclosed publicly and the Google Play product team treats it as  
14 strictly confidential. If publicly revealed, this information could influence the competitive  
15 decision-making and business strategies employed by Google's app store competitors, for  
16 example by influencing how those app stores market themselves to U.S. developers and how  
17 they distinguish themselves from Google Play in the eyes of U.S. developers.

18       78.     **Exhibit 13, Page -230 (the figure and content to the right of the Amazon**  
19 **logo)**. This information contains non-public information regarding Google's confidential non-  
20 public internal strategic considerations related to creating value for and attracting developers to  
21 the Play Store. This information has never been disclosed publicly. Disclosure of this  
22 information would adversely impact Google's current competitive position by enabling Google's  
23 competitors to mimic its confidential strategies in an effort to attract developers away from  
24 Google. This information also contains non-public and confidential data regarding internal  
25 considerations of features regarding billing on Google Play. This information has never been  
26 disclosed publicly and the Google Play product team treats it as strictly confidential. If publicly  
27 revealed, this information could influence the competitive decision-making and business  
28

1 strategies employed by Google's app store competitors, for example by influencing how those  
2 app stores market themselves to U.S. developers and how they distinguish themselves from  
3 Google Play in the eyes of U.S. developers.

4       79.     **Exhibit 13, Page -232 (the text and figures below the headings "General**  
5 **Layout" and "Based on Subscription model")**. This information contains non-public  
6 information regarding Google's confidential non-public internal strategic considerations related  
7 to creating value for and attracting developers to the Play Store. This information has never been  
8 disclosed publicly. Disclosure of this information would adversely impact Google's current  
9 competitive position by enabling Google's competitors to mimic its confidential strategies in an  
10 effort to attract developers away from Google. This information also contains non-public and  
11 confidential data regarding internal considerations of features regarding billing on Google Play.  
12 This information has never been disclosed publicly and the Google Play product team treats it as  
13 strictly confidential. If publicly revealed, this information could influence the competitive  
14 decision-making and business strategies employed by Google's app store competitors, for  
15 example by influencing how those app stores market themselves to U.S. developers and how  
16 they distinguish themselves from Google Play in the eyes of U.S. developers.

17       80.     **Exhibit 13, Page -233 (the figures and content below the heading "Tenured**  
18 **Buyer Incentive Layout: Sensitivities (Backup)")**. This information contains non-public  
19 information regarding Google's confidential non-public internal strategic considerations related  
20 to creating value for and attracting developers to the Play Store. This information has never been  
21 disclosed publicly. Disclosure of this information would adversely impact Google's current  
22 competitive position by enabling Google's competitors to mimic its confidential strategies in an  
23 effort to attract developers away from Google. This information also contains non-public and  
24 confidential data regarding internal considerations of features regarding billing on Google Play.  
25 This information has never been disclosed publicly and the Google Play product team treats it as  
26 strictly confidential. If publicly revealed, this information could influence the competitive  
27 decision-making and business strategies employed by Google's app store competitors, for  
28

1 example by influencing how those app stores market themselves to U.S. developers and how  
2 they distinguish themselves from Google Play in the eyes of U.S. developers.

3 81. **Exhibit 13, Page -234 (the figures and content below the heading “Tenured**  
4 **Buyer Incentive Layout: Sensitivities (Backup)”**). This information contains non-public  
5 information regarding Google’s confidential non-public internal strategic considerations related  
6 to creating value for and attracting developers to the Play Store. This information has never been  
7 disclosed publicly. Disclosure of this information would adversely impact Google’s current  
8 competitive position by enabling Google’s competitors to mimic its confidential strategies in an  
9 effort to attract developers away from Google. This information also contains non-public and  
10 confidential data regarding internal considerations of features regarding billing on Google Play.  
11 This information has never been disclosed publicly and the Google Play product team treats it as  
12 strictly confidential. If publicly revealed, this information could influence the competitive  
13 decision-making and business strategies employed by Google’s app store competitors, for  
14 example by influencing how those app stores market themselves to U.S. developers and how  
15 they distinguish themselves from Google Play in the eyes of U.S. developers.

16 82. **Exhibit 13, Page -235 (the figures and content below the heading “Tenured**  
17 **buyer incentive...”**.) This information contains non-public information regarding Google’s  
18 confidential non-public internal strategic considerations related to creating value for and  
19 attracting developers to the Play Store. This information has never been disclosed publicly.  
20 Disclosure of this information would adversely impact Google’s current competitive position by  
21 enabling Google’s competitors to mimic its confidential strategies in an effort to attract  
22 developers away from Google. This information also contains non-public and confidential data  
23 regarding internal considerations of features regarding billing on Google Play. This information  
24 has never been disclosed publicly and the Google Play product team treats it as strictly  
25 confidential. If publicly revealed, this information could influence the competitive decision-  
26 making and business strategies employed by Google’s app store competitors, for example by  
27  
28

1 influencing how those app stores market themselves to U.S. developers and how they distinguish  
2 themselves from Google Play in the eyes of U.S. developers.

3       83.     **Exhibit 13, Page -237 (the figure in the heading “spend uplift from”; the text**  
4 **and figures underneath the heading.)** This information contains non-public information  
5 regarding Google’s confidential non-public internal strategic considerations related to creating  
6 value for and attracting developers to the Play Store. This information has never been disclosed  
7 publicly. Disclosure of this information would adversely impact Google’s current competitive  
8 position by enabling Google’s competitors to mimic its confidential strategies in an effort to  
9 attract developers away from Google. This information also contains non-public and confidential  
10 data regarding internal considerations of features regarding billing on Google Play. This  
11 information has never been disclosed publicly and the Google Play product team treats it as  
12 strictly confidential. If publicly revealed, this information could influence the competitive  
13 decision-making and business strategies employed by Google’s app store competitors, for  
14 example by influencing how those app stores market themselves to U.S. developers and how  
15 they distinguish themselves from Google Play in the eyes of U.S. developers.

16       84.     **Exhibit 13, Page -241 (between “processing have” and “spread from”; the**  
17 **graph and content below the heading).** This information contains non-public information  
18 regarding Google’s confidential non-public internal strategic considerations related to creating  
19 value for and attracting developers to the Play Store. This information has never been disclosed  
20 publicly. Disclosure of this information would adversely impact Google’s current competitive  
21 position by enabling Google’s competitors to mimic its confidential strategies in an effort to  
22 attract developers away from Google. This information also contains non-public and confidential  
23 data regarding internal considerations of features regarding billing on Google Play. This  
24 information has never been disclosed publicly and the Google Play product team treats it as  
25 strictly confidential. If publicly revealed, this information could influence the competitive  
26 decision-making and business strategies employed by Google’s app store competitors, for  
27  
28



1 example by influencing how those app stores market themselves to U.S. developers and how  
2 they distinguish themselves from Google Play in the eyes of U.S. developers.

3 85. **Exhibit 13, Page -242 (the percentage figures in the right column of the table**  
4 **under the subheader: “Marginal cost transfer from payment processing”).** This information  
5 contains non-public information regarding Google’s confidential non-public internal strategic  
6 considerations related to creating value for and attracting developers to the Play Store. This  
7 information has never been disclosed publicly. Disclosure of this information would adversely  
8 impact Google’s current competitive position by enabling Google’s competitors to mimic its  
9 confidential strategies in an effort to attract developers away from Google. This information also  
10 contains non-public and confidential data regarding internal considerations of features regarding  
11 billing on Google Play. This information has never been disclosed publicly and the Google Play  
12 product team treats it as strictly confidential. If publicly revealed, this information could  
13 influence the competitive decision-making and business strategies employed by Google’s app  
14 store competitors, for example by influencing how those app stores market themselves to U.S.  
15 developers and how they distinguish themselves from Google Play in the eyes of U.S.  
16 developers.

17 86. **Exhibit 13, Page -243 (the figures in the table underneath the headings “on**  
18 **Google Play Billing” and “on Partner Billing”; the text to the right of the table; the**  
19 **percentage in the footnote of the table”).** This information contains non-public information  
20 regarding Google’s confidential non-public internal strategic considerations related to creating  
21 value for and attracting developers to the Play Store. This information has never been disclosed  
22 publicly. Disclosure of this information would adversely impact Google’s current competitive  
23 position by enabling Google’s competitors to mimic its confidential strategies in an effort to  
24 attract developers away from Google. This information also contains non-public and confidential  
25 data regarding internal considerations of features regarding billing on Google Play. This  
26 information has never been disclosed publicly and the Google Play product team treats it as  
27 strictly confidential. If publicly revealed, this information could influence the competitive  
28

1 decision-making and business strategies employed by Google's app store competitors, for  
2 example by influencing how those app stores market themselves to U.S. developers and how  
3 they distinguish themselves from Google Play in the eyes of U.S. developers.

4       87.     **Exhibit 13, Page -244 (the text and figures in the table underneath the**  
5 **heading "\$ at risk").** This information contains non-public information regarding Google's  
6 confidential non-public internal strategic considerations related to creating value for and  
7 attracting developers to the Play Store. This information has never been disclosed publicly.  
8 Disclosure of this information would adversely impact Google's current competitive position by  
9 enabling Google's competitors to mimic its confidential strategies in an effort to attract  
10 developers away from Google. This information also contains non-public and confidential data  
11 regarding internal considerations of features regarding billing on Google Play. This information  
12 has never been disclosed publicly and the Google Play product team treats it as strictly  
13 confidential. If publicly revealed, this information could influence the competitive decision-  
14 making and business strategies employed by Google's app store competitors, for example by  
15 influencing how those app stores market themselves to U.S. developers and how they distinguish  
16 themselves from Google Play in the eyes of U.S. developers.

17       88.     **Exhibit 13, Page -247 (between "To generate" and "to"; between "to" and**  
18 **"in paid discovery"; all text and charts below "without cannibalization, need to believe...").**  
19 This information contains non-public information regarding Google's confidential non-public  
20 internal strategic considerations related to creating value for and attracting developers to the Play  
21 Store. This information has never been disclosed publicly. Disclosure of this information would  
22 adversely impact Google's current competitive position by enabling Google's competitors to  
23 mimic its confidential strategies in an effort to attract developers away from Google. This  
24 information also contains non-public and confidential data regarding internal considerations of  
25 features regarding billing on Google Play. This information has never been disclosed publicly  
26 and the Google Play product team treats it as strictly confidential. If publicly revealed, this  
27 information could influence the competitive decision-making and business strategies employed  
28

1 by Google's app store competitors, for example by influencing how those app stores market  
2 themselves to U.S. developers and how they distinguish themselves from Google Play in the eyes  
3 of U.S. developers.

4 **Plaintiffs' Omnibus Oppositions to Defendants' Omnibus Motions in Limine – Exhibit 14**  
5 **(GOOG-PLAY-004119228.R)**

6 89. **Exhibit 14, Page -229 (between “users with” and “paid out;” the graphic**  
7 **below the heading “Play is operating...”; between “has paid out” and “to developers”;**  
8 **between “growth rate” and “Y/Y growth”; between “with” and “in revenues”; between**  
9 **“Browsers” and “Y/Y growth”; between “businesses” and “and a key”).** This information  
10 reflects and is calculated from internal, non-public Google financial data. Google spends  
11 significant resources compiling and maintaining this valuable data, which is non-public, and if  
12 revealed to competitors and potential business counterparties, could be used to disadvantage and  
13 cause Google competitive harm by giving competitors insight into confidential Google financial  
14 information. Further, this information reflects sensitive, highly confidential characterizations by  
15 Google's internal business teams that, if revealed, could be referenced by potential counterparties  
16 in negotiations with Google to gain an unfair advantage against Google. This information also  
17 contains non-public information regarding Google's confidential non-public internal strategic  
18 considerations related to creating value for and attracting developers to the Play Store. This  
19 information has never been disclosed publicly. Disclosure of this information would adversely  
20 impact Google's current competitive position by enabling Google's competitors to mimic its  
21 confidential strategies in an effort to attract developers away from Google.

22 90. **Exhibit 14, Page -230 (the chart below the heading “Play continues to**  
23 **improve...”; between “our plan of” and “in revenue”; between “sustaining” and**  
24 **“operating margins”; between “growing” and “y/y”; between “growth to” and “y.y in Q2”;**  
25 **between “was” and “growth”).** This information reflects and is calculated from internal, non-  
26 public Google financial data. Google spends significant resources compiling and maintaining this  
27 valuable data, which is non-public, and if revealed to competitors and potential business  
28

1 counterparties, could be used to disadvantage and cause Google competitive harm by giving  
2 competitors insight into confidential Google financial information. Further, this information  
3 reflects sensitive, highly confidential characterizations by Google's internal business teams that,  
4 if revealed, could be referenced by potential counterparties in negotiations with Google to gain  
5 an unfair advantage against Google. This information also contains non-public information  
6 regarding Google's confidential non-public internal strategic considerations related to creating  
7 value for and attracting developers to the Play Store. This information has never been disclosed  
8 publicly. Disclosure of this information would adversely impact Google's current competitive  
9 position by enabling Google's competitors to mimic its confidential strategies in an effort to  
10 attract developers away from Google.

11       91.     **Exhibit 14, Page -231 (between “Our revenues are” and “over plan in H1”;**  
12 **between “strong Q1” and “Y/Y growth) and”;** **between “in Q2” and “Y/Y growth) due”;**  
13 **the chart below the heading “Our revenues are...”;** **between “to roughly” and “of this**  
14 **comes”;** **between “in place” and the end of the sentence;** **between “noted as” and “it is**  
15 **mostly,” between “level are” and “in 1H20”).** This information reflects and is calculated from  
16 internal, non-public Google financial data. Google spends significant resources compiling and  
17 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
18 business counterparties, could be used to disadvantage and cause Google competitive harm by  
19 giving competitors insight into confidential Google financial information. Further, this  
20 information reflects sensitive, highly confidential characterizations by Google's internal business  
21 teams that, if revealed, could be referenced by potential counterparties in negotiations with  
22 Google to gain an unfair advantage against Google. This information also contains non-public  
23 information regarding Google's confidential non-public internal strategic considerations related  
24 to creating value for and attracting developers to the Play Store. This information has never been  
25 disclosed publicly. Disclosure of this information would adversely impact Google's current  
26 competitive position by enabling Google's competitors to mimic its confidential strategies in an  
27 effort to attract developers away from Google.

92. **Exhibit 14, Page -232 (the chart below the heading “Growth Drivers: Emerging markets...”; between “Only” and “of active”; the percentage that begins the sentence “of Play revenue”; between “revenue and” and “of buyers”; between “growing at” and “Y/Y”; between “Y/Y and” and “respectively”; between “tracking at a” and “run rate”; between “YTD spend =” and the end of the sentence; between “and over” and “flowing through”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google. This information also contains non-public information regarding Google's confidential non-public internal strategic considerations related to creating value for and attracting developers to the Play Store. This information has never been disclosed publicly. Disclosure of this information would adversely impact Google's current competitive position by enabling Google's competitors to mimic its confidential strategies in an effort to attract developers away from Google.

93. **Exhibit 14, Page -233 (the percentage figures in the four bullet points on the right side of the slide; between “churn of” and “and a”; between “and a” and “uplift in”).** This information reflects and is calculated from internal, non-public Google financial data. Google spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Google competitive harm by giving competitors insight into confidential Google financial information. Further, this information reflects sensitive, highly confidential characterizations by Google's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Google to gain an unfair advantage against Google.

1 This information also contains non-public information regarding Google's confidential non-  
2 public internal strategic considerations related to creating value for and attracting developers to  
3 the Play Store. This information has never been disclosed publicly. Disclosure of this  
4 information would adversely impact Google's current competitive position by enabling Google's  
5 competitors to mimic its confidential strategies in an effort to attract developers away from  
6 Google.

7 94. **Exhibit 14, Page -234 (from "in the segment" to the end of the sentence;**  
8 **between "all HVUs" and "of Play"; the last line of the page after "non-HVUs to**  
9 **participate.").** This information reflects and is calculated from internal, non-public Google  
10 financial data. Google spends significant resources compiling and maintaining this valuable data,  
11 which is non-public, and if revealed to competitors and potential business counterparties, could  
12 be used to disadvantage and cause Google competitive harm by giving competitors insight into  
13 confidential Google financial information. Further, this information reflects sensitive, highly  
14 confidential characterizations by Google's internal business teams that, if revealed, could be  
15 referenced by potential counterparties in negotiations with Google to gain an unfair advantage  
16 against Google. This information also contains non-public information regarding Google's  
17 confidential non-public internal strategic considerations related to creating value for and  
18 attracting developers to the Play Store. This information has never been disclosed publicly.  
19 Disclosure of this information would adversely impact Google's current competitive position by  
20 enabling Google's competitors to mimic its confidential strategies in an effort to attract  
21 developers away from Google.

22 95. **Exhibit 14, Page -237(the text below the graphic titled "Games Velocity**  
23 **Program" and above "Cross Google deals"; between "Play takes" and "of the revenue").**  
24 This text contains confidential, non-public information regarding Google's agreements with non-  
25 party developers. Disclosure of this non-public information is likely to result in competitive harm  
26 to Google, as it reveals strategic decision-making which, for example, could give a competitor or  
27 potential business partner unfair leverage in competing against or negotiating with Google.  
28

1 Moreover, Google's competitors could use this non-party information to unfairly target Google's  
2 developer partners and offer specific deal terms designed to undercut those offered by Google.

3 96. **Exhibit 14, Page -237-238 (the final paragraph of the page continuing onto**  
4 **the next page until "CEO").** This text contains confidential, non-public information regarding  
5 Google's agreements with non-party developers. Disclosure of this non-public information is  
6 likely to result in competitive harm to Google, as it reveals strategic decision-making which, for  
7 example, could give a competitor or potential business partner unfair leverage in competing  
8 against or negotiating with Google. Moreover, Google's competitors could use this non-party  
9 information to unfairly target Google's developer partners and offer specific deal terms designed  
10 to undercut those offered by Google. Further, The disclosure of a developer's highly confidential  
11 information would significantly harm a developer's business. For example, a developer's  
12 competitors could leverage this information to reap an unearned competitive advantage. They  
13 could exploit this information—that they otherwise would not have access to—to inform their  
14 own business strategies. To prevent these competitive harms from coming to fruition, a  
15 developer proactively maintains the confidentiality of its strategic information, only disclosing it  
16 to a select group of individuals on an as-needed basis.

17 97. **Exhibit 14, Page -238 (between "incremental" and "in cloud").** This text  
18 contains confidential, non-public information regarding Google's agreements with non-party  
19 developers. Disclosure of this non-public information is likely to result in competitive harm to  
20 Google, as it reveals strategic decision-making which, for example, could give a competitor or  
21 potential business partner unfair leverage in competing against or negotiating with Google.  
22 Moreover, Google's competitors could use this non-party information to unfairly target Google's  
23 developer partners and offer specific deal terms designed to undercut those offered by Google.  
24 This information also reflects and is calculated from internal, non-public Google financial data.  
25 Google spends significant resources compiling and maintaining this valuable data, which is non-  
26 public, and if revealed to competitors and potential business counterparties, could be used to  
27 disadvantage and cause Google competitive harm by giving competitors insight into confidential  
28



1 Google financial information. Further, this information reflects sensitive, highly confidential  
2 characterizations by Google's internal business teams that, if revealed, could be referenced by  
3 potential counterparties in negotiations with Google to gain an unfair advantage against Google.

4 98. **Exhibit 14, Page -242 (the numbers and text below the headings “As of 1H**  
5 **2020” and “Scaling Plan by EO’21” and below flag icons; between “covering” and “of**  
6 **total”; between “is strong” and “uplift”; between “nearly all” and “of Play”; between “to**  
7 **achieve” and enrolled”).** This text contains confidential, non-public information regarding  
8 Google’s agreements with non-party developers. Disclosure of this non-public information is  
9 likely to result in competitive harm to Google, as it reveals strategic decision-making which, for  
10 example, could give a competitor or potential business partner unfair leverage in competing  
11 against or negotiating with Google. Moreover, Google’s competitors could use this non-party  
12 information to unfairly target Google's developer partners and offer specific deal terms designed  
13 to undercut those offered by Google. This information also reflects and is calculated from  
14 internal, non-public Google financial data. Google spends significant resources compiling and  
15 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
16 business counterparties, could be used to disadvantage and cause Google competitive harm by  
17 giving competitors insight into confidential Google financial information. Further, this  
18 information reflects sensitive, highly confidential characterizations by Google's internal business  
19 teams that, if revealed, could be referenced by potential counterparties in negotiations with  
20 Google to gain an unfair advantage against Google.

21 99. **Exhibit 14, Page -244 (the chart below the heading “Play buyer base has fast**  
22 **forwarded by 6-9 months during COVID”).** This information reflects and is calculated from  
23 internal, non-public Google financial data. Google spends significant resources compiling and  
24 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
25 business counterparties, could be used to disadvantage and cause Google competitive harm by  
26 giving competitors insight into confidential Google financial information. Further, this  
27 information reflects sensitive, highly confidential characterizations by Google's internal business  
28

1 teams that, if revealed, could be referenced by potential counterparties in negotiations with  
2 Google to gain an unfair advantage against Google.

3 100. **Exhibit 14, Page -245 (the chart below the heading “Order-to-order retention**  
4 **rates are similar to normal times”).** This information reflects and is calculated from internal,  
5 non-public Google financial data. Google spends significant resources compiling and  
6 maintaining this valuable data, which is non-public, and if revealed to competitors and potential  
7 business counterparties, could be used to disadvantage and cause Google competitive harm by  
8 giving competitors insight into confidential Google financial information. Further, this  
9 information reflects sensitive, highly confidential characterizations by Google's internal business  
10 teams that, if revealed, could be referenced by potential counterparties in negotiations with  
11 Google to gain an unfair advantage against Google.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed on the  
13 5th day of October 2023, in Mountain View, California.

14  
15 DocuSigned by:  
16 *Christian Cramer*  
7E2F7561498147C...

17 Christian Cramer  
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